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VIA ECF

Hon. Julien X. Neals, U.S.D.J.
Martin Luther King Building & U.S. Courthouse
50 Walnut Street, Courtroom MLK 5D
Newark, NJ 07102

Re: *Roofers' Pension Fund v. Perrigo Co. plc, et al., No. 16-cv-2805-JXN-LDW*

Dear Judge Neals:

I write on behalf of Lead Plaintiff and Class Representative Perrigo Institutional Investor Group to respectfully request a status conference in the above-referenced securities class action litigation. Given the advanced age of the litigation and Lead Plaintiff's role as a fiduciary to many thousands of absent Class members, Lead Plaintiff believes a status conference to discuss a path and timeline for moving forward is appropriate.

Lead Plaintiff has diligently prosecuted this case since appointment and is eager to proceed to trial. By way of background, this action has been pending since May 2016. Judge Arleo denied in substantial part Defendants' Rule 12(b)(6) motions to dismiss in July 2018. ECF No. 136. Thereafter, the case proceeded to discovery, which has long been complete.

Judge Arleo certified the three Classes in November 2019 (ECF No. 226), and the Third Circuit Court of Appeals denied Defendants' request for interlocutory review of that decision. Pursuant to the Parties' stipulation that was "so ordered" by Judge Arleo, notice of the pendency of this class action has been mailed to over 290,000 potential Class members, who collectively lost billions as a result of the alleged wrongdoing. ECF No. 311.

Defendants' extensive motions for summary judgment were fully briefed in early July 2021. Your Honor initially sought to hear argument on these motions in December 2021, but certain defense counsel requested deferral until 2022. At oral argument in April 2022, the Court observed that this "is a quite old case and justice delayed is justice denied." *See* Tr. of April 7, 2022 Hearing, at 211:4-5. Lead Plaintiff agrees.

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In light of these considerations and the extended age of this case, Lead Plaintiff respectfully requests that the Court schedule a status conference with the Parties at its earliest convenience, to be conducted either telephonically, by video-conference, or in person.

Respectfully,

/s/ Michael B. Himmel

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MBH:tac